

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

COMMISSIONERS OF PUBLIC WORKS OF)	Civil Action No. 2:21-cv-00042-RMG
THE CITY OF CHARLESTON (d.b.a.)	
Charleston Water System), Individually and on)	<u>CLASS ACTION</u>
Behalf of All Others Similarly Situated,)	
Plaintiff,)	PLAINTIFF'S MOTION FOR
vs.)	PRELIMINARY APPROVAL OF CLASS
COSTCO WHOLESALE CORPORATION,)	ACTION SETTLEMENTS
CVS HEALTH CORPORATION,)	
KIMBERLY-CLARK CORPORATION, THE)	
PROCTER & GAMBLE COMPANY,)	
TARGET CORPORATION, WALGREEN)	
CO. and WAL-MART, INC.,)	
Defendants.)	
_____)	

Representative Plaintiff, the Commissioners of Public Works of the City of Charleston (d.b.a. “Charleston Water System”) (“Plaintiff”), respectfully files this motion for an Order granting preliminary approval of the class action settlements with Costco Wholesale Corporation, CVS Health Corporation, Target Corporation, Walgreen Co., and Wal-Mart, Inc. (collectively, the “Settling Defendants”) (collectively with Plaintiff, the “Parties”) that resolves all of Plaintiff’s Released Claims against the Settling Defendants during the Settlement Class Period.¹ For the reasons set forth in the accompanying Memorandum, Plaintiff respectfully moves the Court for an Order:

1. Granting preliminary approval of the Settlements;
2. Certifying a Rule 23(b)(2) class for settlement purposes;
3. Appointing Plaintiff as Class Representative;
4. Appointing Robbins Geller Rudman & Dowd LLP and AquaLaw PLC as Class Counsel;
5. Approving the Parties’ proposed form and method of providing notice of the pendency of the Settlements to the Settlement Class under Rule 23(e)(2); and
6. Scheduling a Settlement hearing for final approval of (a) the Settlements set forth in the Stipulations of Settlement, and (b) Class Counsel’s application for an award of attorneys’ fees and expenses incurred in representing the Settlement Class.

In support of this Motion, Plaintiff incorporates by reference its Memorandum in Support and the Stipulations of Settlement and supporting Exhibits, which are filed simultaneously herewith.

¹ Capitalized terms not defined herein are defined in the Stipulations of Settlement, dated October 11, 2023 and October 26, 2023.

DATED: October 26, 2023

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on October 26, 2023, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which sent notification of such filing to all counsel of record.

/s/ F. Paul Calamita

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